

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551-FDS

**PLAINTIFF'S MOTION TO DEEM ADMITTED DEFENDANT'S INCOMPLETE
AND NON-RESPONSIVE ANSWERS TO THE AMENDED COMPLAINT**

Pursuant to Fed. R. Civ. P. 8(b)(6), plaintiff, Singular Computing LLC (“Singular”), hereby moves to have deemed admitted the incomplete and non-responsive answers of defendant, Google LLC (“Google”) to paragraphs 15, 19-20 and 25 of the Amended Complaint (“AC”). As set forth in the accompanying memorandum of law, Google has refused to provide complete responses. Accordingly, an Order deeming the allegations at issue admitted is now appropriate and warranted. Accordingly, for the reasons set forth below, Singular requests that this motion be granted.

Dated: August 14, 2020

Respectfully submitted,

/s/ Paul J. Hayes

Paul J. Hayes (BBO #227000)
Matthew D. Vella (BBO #660171)
Kevin Gannon (BBO #640931)
Daniel McGonagle (BBO #690084)
PRINCE LOBEL TYE LLP
One International Place, Suite 3700
Boston, MA 02110
Tel: (617) 456-8000
Fax: (617) 456-8100
Email: phayes@princelobel.com
Email: mvella@princelobel.com
Email: kgannon@princelobel.com
Email: dmgonagle@princelobel.com

ATTORNEYS FOR THE PLAINTIFF

LOCAL RULE 7.1 CERTIFICATION

I hereby certify that the parties met and conferred and the parties were unable to resolve or narrow the issues presented in this motion.

/s/ Paul J. Hayes

CERTIFICATE OF SERVICE

I certify that on August 14, 2020, I served this document on Defendant by causing a copy to be sent via electronic mail to its counsel of record via the Court's ECF system.

/s/ Paul J. Hayes